

THESE INTERROGATORIES ARE PROPOUNDED IN ACCORDANCE WITH FED. R. CIV. P. 33. YOU MUST ANSWER EACH QUESTION SEPARATELY AND FULLY IN WRITING AND UNDER OATH. YOU MUST RETURN THE ORIGINAL AND ONE COPY OF YOUR ANSWERS WITHIN THIRTY (30) DAYS OF THE DATE YOU RECEIVED THEM TO THE PARTY OR COUNSEL WHO SERVED THEM UPON YOU. IF YOU OBJECT TO ANY QUESTION, YOU MUST NOTE YOUR OBJECTION AND STATE THE REASON THEREFOR. IF YOU FAIL TO RETURN YOUR ANSWERS WIHTIN THIRTY (30) DAYS, THE PARTY WHO SERVED THEM UPON YOU MAY INFORM THE COURT, AND THE COURT SHALL MAKE SUCH ORDERS AS JUSTICE REQUIRES, INCLUDING THE ENTRY OF A CONDITIONAL DEFAULT AGAINST YOU.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

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Kaitlin Hudson, )  
Plaintiff, )  
v. ) Civil Action No. 11-CV-00278-JD  
Dr. Michael J. O'Connell's Pain Care )  
Center, Inc. and Dr. Michael J. O'Connell, )  
Defendants. )

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**DEFENDANTS' FIRST SET OF INTERROGATORIES PROPOUNDED UPON**  
**PLAINTIFF, KAITLIN HUDSON**

NOW COMES Defendants, Dr. Michael J. O'Connell's Pain Care Center, Inc. and Dr. Michael J. O'Connell, by and through counsel, Shaheen & Gordon, P.A., and, pursuant to Rule 33 of the Federal Rules of Civil Procedure, hereby propounds interrogatories to Plaintiff, Kaitlin Hudson, to be answered under oath and returned to Shaheen & Gordon, P.A., 107 Storrs Street, P.O. Box 2703, Concord, NH 03302, within thirty (30) days.

**INSTRUCTIONS AND DEFINITIONS**

1. "PERSON" means and includes a natural person, partnership, firm, or corporation or any other kind of business or legal entity, including any governmental entity, its agents or employees.

11. Please identify all violations, misdemeanors and felonies for which you have been charged or convicted.

**ANSWER:**

Objection. This interrogatory is beyond the scope of discovery, overly broad, and unlikely to lead to the discovery of admissible evidence. Without waiving this objection I have been convicted in New Hampshire of Theft by Unauthorized Taking (felony), two counts of Receiving Stolen Property (misdemeanor), two counts of Theft by Deception (misdemeanor), Shoplifting (misdemeanor), and Robbery (felony).

DATED: 9-21-11

Kaitlin Hudson  
Kaitlin Hudson

STATE OF NEW HAMPSHIRE  
COUNTY OF ROCKINGHAM

On this 21<sup>st</sup> day of October, 2011 personally appeared Kaitlin Hudson and made oath that the answers subscribed hereto are true and correct to the best of her knowledge, belief and information.

J.A.P. Newman  
Notary Public/Justice of the Peace  
Comm: 9/23/2014  
EXPIRES